# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re:	)	Chapter 11
SUNPOWER CORPORATION,1	)	Case No. 24-11649 (CTG)
Wind-Down Debtor.	)	
	)	

## NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON NOVEMBER 20, 2025 AT 11:00 A.M. (EST)

THIS PROCEEDING WILL BE CONDUCTED IN-PERSON AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 3<sup>RD</sup> FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.

ALL COUNSEL AND WITNESSES ARE EXPECTED TO ATTEND UNLESS PERMITTED TO APPEAR REMOTELY VIA ZOOM.

PLEASE REFER TO JUDGE GOLDBLATT'S CHAMBERS PROCEDURES (HTTPS://WWW.DEB.USCOURTS.GOV/JUDGE-CRAIG-T-GOLDBLATT) AND THE COURT'S WEBSITE (HTTP://WWW.DEB.USCOURTS.GOV/ECOURT-APPEARANCES) FOR INFORMATION ON WHO MAY PARTICIPATE REMOTELY, THE METHOD OF ALLOWED PARTICIPATION (VIDEO OR AUDIO), JUDGE GOLDBLATT'S EXPECTATIONS OF REMOTE PARTICIPANTS, AND THE ADVANCE REGISTRATION REQUIREMENTS.

REGISTRATION IS REQUIRED BY 4:00 P.M. (EASTERN TIME) THE BUSINESS DAY

BEFORE THE HEARING UNLESS OTHERWISE NOTICED USING

THE ECOURTAPPEARANCES TOOL AVAILABLE ON THE COURT'S WEBSITE.

<sup>&</sup>lt;sup>1</sup> The Wind-Down Debtor in this chapter 11 case, along with the last four digits of the Wind-Down Debtor's federal tax identification number, is: SunPower Corporation (8969) ("SunPower"). On February 18, 2025, the Court entered an order closing the chapter 11 cases of SunPower's debtor affiliates (collectively, the "Closing Debtors"). The Closing Debtors, along with the last four digits of the Closing Debtor's federal tax identification number, are: SunPower Corporation, Systems (8962); SunPower Capital, LLC (8450); SunPower Capital Services, LLC (9910); SunPower HoldCo, LLC (0454); SunPower North America, LLC (0194); Blue Raven Solar, LLC (3692); Blue Raven Solar Holdings, LLC (4577); BRS Field Ops, LLC (2370); and Falcon Acquisition HoldCo, Inc. (3335). The location of the Wind-Down Debtor's service address for purposes of this chapter 11 case is: 655 15th Street, NW, Suite 600, Washington, DC 20005, Attn: Mark Roberts, in his capacity as the Plan Administrator.

#### I. ADJOURNED MATTERS:

1. Motion of KB Home South Bay Inc., KB Home Greater Los Angeles Inc., KB Home Sacramento Inc., KB Home Coastal Inc., KB Home Raleigh-Durham Inc., and KB Home Service Company LLC for Allowance and Payment of Administrative Expense Claims [Docket No. 1148; filed December 13, 2024]

Response/Objection Deadline:

December 27, 2024 at 4:00 p.m. (EST); extended to December 31, 2025 (pending approval of the Court; *see* D.I. 1655) for the Plan Administrator

## Responses/Objections Received:

- A. Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [Docket No. 1188; filed December 23, 2024]
- B. Amended Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [Docket No. 1198; filed December 30, 2024]
- C. Further Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [Docket No. 1312; filed February 6, 2025]

<u>Status</u>: The hearing on this matter is adjourned to the hearing scheduled to take place on December 15, 2025 starting at 10:00 a.m. (EST).

2. D.R. Horton's Request for Allowance and Payment of Administrative Expense Claim [Docket No. 1153; filed December 13, 2024]

Response/Objection Deadline:

December 27, 2024 at 4:00 p.m. (EST); extended to December 31, 2025 (pending approval of the Court; *see* D.I. 1655) for the Plan Administrator

### Responses/Objections Received:

A. Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [Docket No. 1188; filed December 23, 2024]

- B. Amended Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [Docket No. 1198; filed December 30, 2024]
- C. Further Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [Docket No. 1312; filed February 6, 2025]

Status: The hearing on this matter is adjourned to the hearing scheduled to take place on December 15, 2025 starting at 10:00 a.m. (EST).

3. The Plan Administrator's Objection to Proof of Claim No. 621 filed by the California Department of Tax and Fee Administration [Docket No. 1422; filed April 8, 2025]

Response/Objection Deadline: April 29, 2025 at 4:00 p.m. (EDT)

## Responses/Objections Received:

A. California Department of Tax and Fee Administration's Response to the Plan Administrator's Objection to Proof of Claim No. 621 filed by the California Department of Tax and Fee Administration [Docket No. 1493; filed April 28, 2025]

#### Related Documents:

i. Notice of Submission of Copies of Proofs of Claim [Docket No. 1498; filed May 6, 2025]

Status: The hearing on this matter is adjourned to the hearing scheduled to take place on December 15, 2025 starting at 10:00 a.m. (EST).

4. The Plan Administrator's Objection to Proof of Claim No. 622 filed by the California Department of Tax and Fee Administration [Docket No. 1423; filed April 8, 2025]

Response/Objection Deadline: April 29, 2025 at 4:00 p.m. (EDT)

# Responses/Objections Received:

A. California Department of Tax and Fee Administration's Response to the Plan Administrator's Objection to Proof of Claim No. 622 filed by the California Department of Tax and Fee Administration [Docket No. 1494; filed April 28, 2025]

#### Related Documents:

 Notice of Submission of Copies of Proofs of Claim [<u>Docket No. 1498</u>; filed May 6, 2025]

Status: The hearing on this matter is adjourned to the hearing scheduled to take place on December 15, 2025 starting at 10:00 a.m. (EST).

#### II. MATTERS FILED UNDER CERTIFICATIONS:

5. The Plan Administrator's (Fourth) Motion for Entry of an Order Further Extending the Deadline to Object to Administrative Claims Under the Plan [Docket No. 1655; filed October 9, 2025]

Response/Objection Deadline: October 23, 2025 at 4:00 p.m. (EDT)

Responses/Objections Received: None

### Related Documents:

i. Certification of No Objection Regarding "The Plan Administrator's (Fourth) Motion for Entry of an Order Further Extending the Deadline to Object to Administrative Claims Under the Plan" [D.I. 1655] [Docket No. 1688; filed November 17, 2025]

Status: On November 17, 2025, the Plan Administrator filed a certification of no objection regarding this matter. Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

6. The Plan Administrator's Sixteenth Omnibus Objection to Certain Amended and Replaced Claims (Non-Substantive) [Docket No. 1670; filed October 17, 2025]

Response/Objection Deadline: November 7, 2025 at 4:00 p.m. (EST)

## Responses/Objections Received:

A. California Department of Tax and Fee Administration's Response to the Plan Administrator's Sixteenth Omnibus Objection to Certain Amended and Replaced Claims (Non-Substantive) [Docket No. 1680; filed November 6, 2025]

#### Related Documents:

i. Notice of Submission of Copies of Proofs of Claim Regarding the Plan Administrator's Sixteenth Omnibus Objection to Certain Amended and Replaced Claims (Non-Substantive) [Docket No. 1677; filed November 4, 2025]

ii. Certification of Counsel Concerning the "Order Sustaining Plan Administrator's Sixteenth Omnibus Objection to Certain Amended and Replaced Claims (Non-Substantive) [D.I. 1670] [Docket No. 1692; filed November 17, 2025]

Status: On November 17, 2025, the Plan Administrator filed a revised form of order in connection with this matter under a certification of counsel. Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

## **III.** MATTERS GOING FORWARD:

7. Joint Motion (Second) of the Plan Administrator and the Creditor Trustee for Entry of an Order Further Extending the Deadline to Object to Claims Under the Plan [Docket No. 1673; filed October 28, 2025]

Response/Objection Deadline: November 12, 2025 at 4:00 p.m. (EST)

Responses/Objections Received: None

Status: The Plan Administrator and the Creditor Trustee intend to file a certification of no objection in connection with this matter prior to the hearing. Consequently, a hearing with respect to this matter should only be required to the extent that the Court has any questions or concerns.

8. Joint Motion of the Plan Administrator and the Creditor Trustee for Entry of an Order Further Enlarging the Period Within Which the Plan Administrator and/or Creditor Trustee May Remove Actions [Docket No. 1674; filed October 29, 2025]

Response/Objection Deadline: November 12, 2025 at 4:00 p.m. (EST)

Responses/Objections Received: None

Status: The Plan Administrator and the Creditor Trustee intend to file a certification of no objection in connection with this matter prior to the hearing. Consequently, a hearing with respect to this matter should only be required to the extent that the Court has any questions or concerns.

#### IV. <u>CONTESTED MATTER:</u>

9. Notice of Hearing on Various Contested Claims and Pending Omnibus Objections Related Thereto [Docket No. 1669; filed October 17, 2025]

Response/Objection Deadline: N/A

Responses/Objections Received: N/A

### **Related Documents:**

- i. The Plan Administrator's First Omnibus Objection to Certain Amended and Replaced Claims, Exact Duplicate Claims, Late Claims and Equity Claims (Non-Substantive) [Docket No. 1180; filed December 19, 2024]
  - a. Response to the Plan Administrator's First Omnibus Objection to Certain Amended and Replaced Claims, Exact Duplicate Claims, Late Claims and Equity Claims (Non-Substantive) filed by Dorma Bruce [Docket No. 1223; filed January 7, 2025]
  - b. Response to the Plan Administrator's First Omnibus Objection to Certain Amended and Replaced Claims, Exact Duplicate Claims, Late Claims and Equity Claims (Non-Substantive) filed by Linda Williams [Docket No. 1245; filed January 13, 2025]
  - c. Response to the Plan Administrator's First Omnibus Objection to Certain Amended and Replaced Claims, Exact Duplicate Claims, Late Claims and Equity Claims (Non-Substantive) filed by Fabiola Casas [Docket No. 1248; filed January 14, 2025]
- ii. The Plan Administrator's Second Omnibus Objection to Certain Reclassified Claims (Substantive) [Docket No. 1181; filed December 19, 2024]
  - a. Response to the Plan Administrator's Second Omnibus Objection to Certain Reclassified Claims (Substantive) filed by Huy M. Cao [Docket No. 1224; filed January 7, 2025]
  - b. Response to the Plan Administrator's Second Omnibus Objection to Certain Reclassified Claims (Substantive) filed by Frances DeJesus [Docket No. 1227; filed January 8, 2025]
  - c. Claimant Karen Esposito's Objection to Administrator's Second Omnibus Objection to Certain Reclassified Claims and Hearing Thereon [Docket No. 1250; filed January 14, 2025]
  - d. Claimant Karen Esposito's Objection to Administrator's Second Omnibus Objection to Certain Reclassified Claims

- and Hearing Thereon [Docket No. 1251; filed January 14, 2025]
- iii. The Plan Administrator's Third Omnibus Objection to Certain Reclassified Claims (Substantive) [Docket No. 1182; filed December 19, 2024]
  - a. Response to the Plan Administrator's Third Omnibus Objection to Certain Reclassified Claims (Substantive) filed by Laura Seese [Docket No. 1240; filed January 13, 2025]
  - b. Response to the Plan Administrator's Third Omnibus Objection to Certain Reclassified Claims (Substantive) filed by Laura Seese [Docket No. 1247; filed January 13, 2025]
  - c. Response to the Plan Administrator's Third Omnibus Objection to Certain Reclassified Claims (Substantive) filed by Laura Seese [Docket No. 1318; filed February 10, 2025]
  - d. Response to the Plan Administrator's Third Omnibus Objection to Certain Reclassified Claims (Substantive) filed by Laura Seese [Docket No. 1320; filed February 10, 2025]
  - e. Response to the Plan Administrator's Third Omnibus Objection to Certain Reclassified Claims (Substantive) filed by Laura Seese [Docket No. 1321; filed February 10, 2025]
- iv. The Plan Administrator's Fourth Omnibus Objection to Certain Reclassified Claims, Cross-Debtor Duplicate Claims, and Substantive Duplicate Claims (Substantive) [Docket No. 1183; filed December 19, 2024]
  - a. Response to the Plan Administrator's Fourth Omnibus Objection to Certain Reclassified Claims, Cross-Debtor Duplicate Claims, and Substantive Duplicate Claims (Substantive) filed by Jacob Frick and William Pape [Docket No. 1238; filed January 13, 2025]
  - b. Response to the Plan Administrator's Third Omnibus Objection to Certain Reclassified Claims (Substantive) filed by Laura Seese [Docket No. 1247; filed January 13, 2025]
- v. The Plan Administrator's Fifth Omnibus Objection to Certain Late Claims, Equity Claims, Amended and Replaced Claims, and Exact Duplicate Claims (Non-Substantive) [Docket No. 1256; filed January 21, 2025]

- a. Response to the Plan Administrator's Fifth Omnibus Objection to Certain Late Claims, Equity Claims, Amended and Replaced Claims, and Exact Duplicate Claims (Non-Substantive) filed by Abraham L. Valdez [Docket No. 1308; filed February 5, 2025]
- b. Response to the Plan Administrator's Fifth Omnibus Objection to Certain Late Claims, Equity Claims, Amended and Replaced Claims, and Exact Duplicate Claims (Non-Substantive) filed by Pauline Pisiw [Docket No. 1323; filed February 10, 2025]
- c. Response to the Plan Administrator's Fifth Omnibus Objection to Certain Late Claims, Equity Claims, Amended and Replaced Claims, and Exact Duplicate Claims (Non-Substantive) filed by Wenhua Zhang [Docket No. 1336; filed February 12, 2025]
- vi. The Plan Administrator's Sixth Omnibus Objection to Certain Substantive Duplicate Claims, Insufficient Documentation Claims, No Liability Claims, and Cross-Debtor Duplicate Claims (Substantive) [Docket No. 1257; filed January 21, 2025]
  - a. Informal comments from Vanguard Screening Solutions Inc.
  - b. Response to the Plan Administrator's Sixth Omnibus Objection to Certain Substantive Duplicate Claims, Insufficient Documentation Claims, No Liability Claims, and Cross-Debtor Duplicate Claims (Substantive) filed by Thomas C. Kasprzak [Docket No. 1298; filed January 31, 2025]
- vii. The Plan Administrator's Seventh Omnibus Objection to Certain Reclassified Claims, Partially Satisfied and No Liability Claims, Amount Modify Claims, and Amount Modify and Reclassification Claims (Substantive) [Docket No. 1258; filed January 21, 2025]
  - a. Response to the Plan Administrator's Seventh Omnibus Objection to Certain Reclassified Claims, Partially Satisfied and No Liability Claims, Amount Modify Claims, and Amount Modify and Reclassification Claims (Substantive) filed by Aximsoft Corporation [Docket No. 1302; filed February 3, 2025]

- b. Response to the Plan Administrator's Seventh Omnibus Objection to Certain Reclassified Claims, Partially Satisfied and No Liability Claims, Amount Modify Claims, and Amount Modify and Reclassification Claims (Substantive) filed by Valerie Eyer [Docket No. 1327; filed February 11, 2025]
- viii. The Plan Administrator's Tenth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive) [Docket No. 1408; filed March 21, 2025]
  - a. Response to Notice of "The Plan Administrator's Tenth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive)" and Hearing Thereon filed by Koala Insulation of Denver North [Docket No. 1450; filed April 16, 2025]
- ix. The Plan Administrator's Fifteenth Omnibus Objection to Certain Late Claims (Non-Substantive) [Docket No. 1595; filed July 24, 2025]
  - a. Response to the Plan Administrator's Fifteenth Omnibus Objection to Certain Late Claims filed by Merlene Steinbeck [Docket No. 1605; filed August 7, 2025]
  - b. Response to the Plan Administrator's Fifteenth Omnibus Objection to Certain Late Claims (Non-Substantive) filed by Alfred Montoya [Docket No. 1611; filed August 12, 2025]
- x. Notice of Submission of Copies of Proofs of Claim [Docket No. 1676; filed November 4, 2025]
- xi. Amended and Superseding Notice of Hearing on Various Contested Claims and Pending Omnibus Objections Related Thereto [Docket No. 1682; filed November 6, 2025]
- xii. Notice of Filing Proposed "Omnibus Order Sustaining Objections to Certain Reclassified Claims, Late Filed Claims, Cross Debtor Duplicate Claims and No Liability Claims" [Docket No. 1689; filed November 17, 2025]
- xiii. The Plan Administrator's Omnibus Reply in Support of Certain Omnibus Claim Objections [Docket No. 1690; filed November 17, 2025]
- xiv. Supplemental Declaration of Mark Roberts in Support of the Plan Administrator's Omnibus Reply to Certain Omnibus Claim Objections [Docket No. 1691; filed November 17, 2025]

### Plan Administrator's Witness Information:

A. Mark Roberts, Managing Director of Alvarez & Marsal North America, LLC

Status: The hearing on this matter will go forward on a contested basis with respect to each of the responses listed under items (i)-(ix) and the relevant claims in connection therewith.

Dated: November 17, 2025 Wilmington, Delaware Respectfully submitted,

### /s/ Jason M. Madron

RICHARDS, LAYTON & FINGER, P.A.

Kevin Gross (DE Bar No. 209) Mark D. Collins (DE Bar No. 2981) Jason M. Madron (DE Bar No. 4431) Zachary J. Javorsky (DE Bar No. 7069)

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